

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF:

ZULMA I. RODRIGUEZ RIVERA
PEDRO MARIN RECHES

Case No. 09-06214 ESL
Chapter 7

Debtors

ZULMA I. RODRIGUEZ RIVERA
PEDRO MARIN RECHES

Adv. Proc. No. 09-00256

Plaintiffs

Vs.

PUERTO RICO TELEPHONE COMPANY

Defendant

**APPLICATION FOR ATTORNEY'S FEES
FOR LEGAL SERVICES IN ADVERSARY PROCEDURE**

The undersigned attorneys states that:

1. We are the attorneys for the Debtors/Plaintiffs in this adversary procedure.
2. Both attorneys are members of the Landrón & Rodríguez Law Offices representing the plaintiffs and both participated in the litigation of the case.
3. Rule 2016(a) of the Rules of Bankruptcy Procedure does not apply in this adversary procedure since no compensation or reimbursements are sought from the bankruptcy estate.
4. On August 2, 2010 this Court entered a partial judgment by

default against defendant Puerto Rico Telephone Company as to their liability for attorney's fees (dkt.#23).

5. At the evidentiary hearing of August 3, 2010 this Court awarded attorney's fees and costs related to this case.
6. The attorneys hereby submit an itemized record of the services rendered described in detail in the attached invoice.
7. The undersigned have not shared or agreed to share with any other entity any compensation paid or to be paid.

WHEREFORE, Debtors' attorney hereby respectfully requests that this Honorable Court approve the attorney's fees in the amount of \$12,040.00 as detailed in the attached invoice, as part of the damages awarded in the adversary procedure against Puerto Rico Telephone Company.

August 6, 2010

/s/ Otto E. Landrón Pérez

/s/ Carlo J. Rodríguez Puigdollers

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INVOICE

Client: **Zulma I. Rodriguez Rivera**
Pedro Marin Reches

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DESCRIPTION OF WORK PERFORMED

DATE	ATTY	DESCRIPTION	RATE	TIME	TOTAL
08/22/09	OEL	Counsel clients as to billing statement received from PRTC.	200/00	30min	100.00
09/22/09	OEL	Review PRTC collection letter and billing statement and interview client to obtain pertinent data.	200/hr	30mn	100.00
10/01/09	OEL	Draft and mail letter to PRTC Bankruptcy Office objecting collection efforts.	200/hr	3hr	600.00
10/22/09	OEL	Review PRTC billing statement and counsel clients.	200/hr	30mn	100.00
11/22/09	OEL	Review PRTC billing statement and counsel client	200/hr	30mn	100.00
12/15/09	OEL	Legal research and draft complaint for violation of automatic stay	200/hr	5hr	1,000.00
12/17/09	OEL	Phone PRTC for information on president and address. Prepare adversary procedure cover sheet and summons. Final draft of complaint.	200/hr	4hr	800.00
12/18/09	OEL	Personally appear at Bankruptcy Court to file adversary procedure and present summons.	200/hr	2hr	400.00
12/22/09	OEL	Served PRTC with complaint and summons, drafted and filed certificate of service	200/hr	2hr	400.00
02/10/10	OEL	Legal research and draft of Application for Default Judgment	200/hr	4hr	800.00
02/11/10	OEL	Final draft of Application and file same	200/hr	2hr	400.00
06/03/10	CJRP	Preparation for pretrial hearing	200/hr	3hr	600.00
06/04/10	CJRP	Represent plaintiffs at pretrial hearing	200/hr	2hr	400.00
06/25/10	OEL	Research and draft of Application for Partial Judgment By Default as to Liability	200/hr	6hr	1,200.00

DATE	ATTY	DESCRIPTION	RATE	TIME	TOTAL
06/30/10	OEL	Final draft of Application for Partial Judgment by Default as to Liability and filing of same.	200/hr	3hr	600.00
08/01/10	OEL	Counsel with plaintiffs and legal research drafting interrogatories	200/hr	2hr	400.00
08/02/10	CJRP	Research, drafting interrogatories and preparation for hearing	200/hr	5hr	1,000.00
08/02/10	OEL	Research, drafting interrogatories,	200/hr	8hr	1,600.00
08/03/10	CJRP	Represent plaintiffs at evidentiary hearing	200/hr	2hr	400.00
08/03/10	OEL	Represent plaintiffs at evidentiary hearing	200/hr	2hr	400.00
08/05/10	OEL	Draft application for fees	200/hr	2hr	400.00
Various	SEC	Telephone calls and letters to plaintiffs, etc.	60/hr	4hr	240.00
		TOTAL			12,040

August 6, 2010
 OEL = Lead Counsel
 CJRP = Co-Counsel
 SEC = Secretary

I hereby certify that this invoice is true and correct according to our files and work performed.

/s/ Otto E. Landrón Pérez, Esquire

/s/ Carlo J. Rodriguez Puigdollers, Esq.